

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AARON ABADI,

Plaintiff,

-against-

AMERICAN AIRLINES, INC., et al.,

Defendants.

23 Civ. 04033 (LJL)

**REPLY DECLARATION OF ELISA KANG  
IN FURTHER SUPPORT OF ASIANA  
AIRLINES'S MOTION TO DISMISS**

Elisa Kang declares as follows pursuant to 28 U.S.C. § 1746:

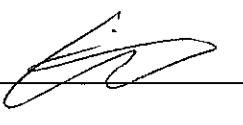
1. I am Manager Customer Relations Team & PSC of Asiana Airlines, Inc. (Asiana).

I submit this reply declaration to inform the Court of one point of fact derived from Asiana records in support of Asiana's motion to dismiss pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure.

2. During the Covid pandemic, Asiana suspended most of its domestic and international flights and routes. In particular, in September 2021, when Mr. Abadi claims to have inquired about flying, Asiana had only three (charter) flights that entire month from Delhi to Seoul, on September 3, 17 and 30. This relates to the plausibility of Mr. Abadi's suggestion that he could have flown from Delhi to Seoul to New York in approximately 22 hours, which stems from an itinerary he created using Asiana's current (March 2024) flight schedules. See his Opposition Brief Exhibit C.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 20, 2024, in Los Angeles, California



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Elisa Kang